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5 Attorney for Defendant
PAUL LOISEL

6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

8 UNITED STATES OF AMERICA,)

9 Plaintiff,)

CASE NO. 2:16-cr-00058-APG-PAL

10 vs.)

11 PAUL LOISEL,)

12 Defendant.)
13

14 **STIPULATION TO CONTINUE MOTION DEADLINES**
15 (Second Request)

16 **IT IS HEREBY STIPULATED AND AGREED**, by and between Daniel G. Bogden,
17 United States Attorney, and Phillip Smith, Esq., Assistant United States Attorney, counsel for the
18 United States of America, and William B. Terry, Esq., of the law offices of William B. Terry,
19 Chartered, counsel for the Defendant, Paul Loisel, and Nicholas Wooldridge, Esq., co-counsel for
20 defendant, Paul Loisel, as follows:

21 **IT IS HEREBY STIPULATED AND AGREED**, that counsel for the defense shall have
22 up to and including May 27, 2016, within which to file any motions;

23 **IT IS FURTHER STIPULATED AND AGREED**, by and between the parties herein, that
24 the Government shall have up to and including June 10, 2016, to file any responses;

25 **IT IS FURTHER STIPULATED AND AGREED**, by and between the parties herein, that
26 the counsel for the defense shall have up to and including June 17, 2016, to file any replies;

27 This stipulation is entered into based on the following reasons:

- 28 1. Counsel for the defense is in the process of still reviewing all the discovery in this
matter;

2. The parties have not been able to come to a resolution and this matter may proceed to trial;
3. Counsel for the defendant has spoken to the defendant and the defendant has no objection to the requested continuance;
4. Counsel for the defendant have spoken to counsel for the Plaintiff who has no objection to the requested continuance;
5. Denial of this request for continuance would result in a miscarriage of justice;
5. For all of the above-stated reasons, the ends of justice would be best served by a continuance of the trial date;
6. The additional time requested by this stipulation, is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. §3161(h)(8)(A), considering the factors under 18 U.S.C. §3161(h)(8)(B)(I) and (iv); and
7. There has been one prior requests for a continuance of the motion deadlines in this case.

DATED this 22nd day of April, 2016.

/s/ Phillip Smith
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/s/ William Terry
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/s/ Nicholas Wooldridge
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Attorney for Paul Loisel

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PAUL LOISEL,

Defendant.

CASE NO. 2:16-cr-00058-APG-PAL

FINDINGS OF FACT

Based upon the pending stipulation of the parties, and good cause appearing therefore, the Court finds that:

1. Counsel for the defense is in the process of reviewing all the discovery in this matter;
2. The parties have not been able to come to a resolution and this matter may proceed to trial;
3. Counsel for the defendant has spoken to the defendant and the defendant has no objection to the requested continuance;
4. Counsel for the defendants have spoken to counsel for the Plaintiff who has no objection to the requested continuance;
5. There have been no prior request for a continuance of the motion deadlines in this case.

CONCLUSIONS OF LAW

1. Denial of this request for continuance would result in a miscarriage of justice;
2. For all of the above-stated reasons, the ends of justice would be best served by a continuance of the trial date;
3. The additional time requested by this stipulation, is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. §3161(h)(8)(A), considering the factors under 18 U.S.C. §3161(h)(8)(B)(I) and (iv); and

ORDER

IT IS THEREFORE ORDERED that counsel for the defense shall have up to and including May 27, 2016, within which to file any motions;

IT IS FURTHER ORDERED by and between the parties herein, that the Government shall have up to and including June 10, 2016, to file any responses;

IT IS FURTHER ORDERED by and between the parties herein, that the counsel for the defense shall have up to and including June 17, 2016, to file any replies.

DATED this 25th day of April, 2016.



UNITED STATES DISTRICT JUDGE